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TECHNICAL STANDARD OPERATING PROCEDUREDate: July 15, 1999SOP No. MK-VBI70-04Title: **Investigation Derived Waste Management****APPROVALS:**

Morrison Knudsen Corporation

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SYNOPSIS: Provides procedures to manage investigation derived wastes.

Received by QA Unit**REVIEWS:****TEAM MEMBER****SIGNATURE/TITLE****DATE**

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REV.	DATE	REVISION DESCRIPTION

MORRISON KNUDSEN CORPORATION
Response Action Contract No. 68-W7-0039SOP No. MK-VBI70-04
Revision No. 0
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TECHNICAL STANDARD OPERATING PROCEDURE INVESTIGATION DERIVED WASTE MANAGEMENT

1.0 PURPOSE

The purpose of this procedure is to describe the methods that will be used by Morrison Knudsen personnel assigned to the VB/I-70 project and their subcontractors to manage investigation derived wastes (IDW).

2.0 SCOPE

This procedure covers management of all IDW, including trash, soils, water, and personal protective equipment (PPE). Management procedures include waste collection, segregation, characterization, storage, shipping and disposal, as appropriate for each waste stream.

3.0 REFERENCES

Management of Investigation-Derived Wastes During Site Inspections, EPA/540/G-91/009

Code of Federal Regulations, Chapter 50, Parts 262 and 265.

4.0 DEFINITIONS

DOT: Department of Transportation

IDW: Investigation Derived Waste

PPE: Personal Protection Equipment

5.0 RESPONSIBILITIES

All **Field Personnel** will be responsible for managing IDW in accordance with this procedure.

The **Field Supervisor** will be responsible for training field personnel to the requirements of this plan, verifying its implementation, and generating and maintaining required records.



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The **Site Manager** will be responsible for ensuring that personnel are properly trained and providing guidance for any special circumstances that may arise.

6.0 EQUIPMENT

- DOT compliant containers as specified in 40 CFR 265 Subpart I.
- Non-hazardous (and if necessary Hazardous) Waste Labels
- Spill Control Materials

7.0 REQUIREMENTS

7.1 General

All IDW will be managed in accordance with federal, state, and local rules and regulations. Personnel responsible for hazardous waste labeling, inspecting, profiling, manifesting, and transportation preparation will be trained per 29 CFR 1910.120 and 49 CFR 172.704.

7.2 Waste Types

Waste streams anticipated to be generated during the work activities include:

- Raw fraction soils and vegetation
- Bulk and fine fraction soil
- Disposable gloves and other personal protection equipment (PPE)
- Decontamination rinsate generated at residential properties
- Decontamination rinsate generated at the field office/laboratory
- Trash

7.2.1 Raw Fraction Soils and Vegetation - The large fraction soils and vegetation will be separated from the fine fraction soils during sample collection, preparation and sieving procedures. Large fraction soils or vegetation, including sod, generated at individual residential properties should be left at the property in the vicinity of the sample location(s). Large fraction soils or vegetation generated during sample preparation at the



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field office/laboratory will be contained and stored in drums pending profiling and disposal as described below.

- 7.2.2 Bulk and Fine Fraction Soil - Bulk and fine fraction soils will be generated at the field office/laboratory by the sample preparation process. Any portion of the prepared soils that are not archived will be contained and stored in drums pending profiling and disposal as described below.
- 7.2.3 Disposable Gloves and PPE - Disposable PPE including gloves will be double bagged and disposed along with trash at a municipal landfill. Gloves that are grossly impacted by soils will be decontaminated prior to disposal.
- 7.2.4 Decontamination Rinsate Generated at Residential Properties - Rinsate generated at individual properties from equipment or personnel decontamination will be disposed on the property at which the equipment was used, prior to leaving that property.
- 7.2.5 Decontamination Rinsate Generated at Field Office/Laboratory - Rinsate generated at the field office/laboratory from equipment or personnel decontamination will be contained and stored in drums pending profiling and disposal as described below.
- 7.2.6 Trash - All trash generated during the project will be contained in plastic trash bags for pick-up and disposal by a municipal trash management company; unauthorized disposal of trash in trash recepticals that service City of Denver residents and businesses will not be permitted.
- 7.3 Contained Waste**
- 7.3.1 Containers - Soils and decontamination rinsate waste generated at the field office/laboratory will be contained in DOT-compliant drums in accordance with 40 CFR 265 Part I. Trash and PPE contained outdoors will be placed in a closed plastic trash receptical to prevent disturbance by animals and dispersion by wind.



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- 7.3.2 Labeling - All drummed IDW will be labeled as to its contents, source of material and the date on which waste accumulation begins. Non-hazardous waste labels will be used if appropriate. Additional labeling requirements specified in 40 CFR 262 and 265 Subpart I will be performed for waste that it determined to meet the criteria of a RCRA Hazardous Waste.
- 7.3.3 Storage - All drummed IDW will be stored in a designated area and in a manner that minimizes the potential for container damage or personnel injury. Non-hazardous waste will be segregated from waste that is determined to meet the criteria of a RCRA Hazardous Waste. As a protective measure, hazardous waste will be stored in a secure (fenced), lined, bermed area, and will be subject to weekly inspections in accordance with 40 CFR 262. Water accumulating in the lined storage area after a precipitation event will be removed and contained with the non-hazardous rinsate waste.
- 7.3.4 Profiling - All drummed IDW will be profiled using knowledge of the material and/or analytical data. Profile forms will be completed and submitted to the appropriate disposal facility as the basis of waste acceptance.
- 7.3.5 Transportation and Disposal - Drummed IDW will be transported and disposed by transporters and facilities permitted to manage the profiled waste. All non-hazardous waste will be managed as industrial or special waste, and shipped under a non-hazardous waste bill of lading. Hazardous waste will be shipped to an EPA-approved RCRA Subtitle C facility under a RCRA Uniform Hazardous Waste Manifest, identified with the EPA Generator ID, and in accordance with all DOT requirements for shipping hazardous materials. A DOT Hazardous Material Registration must be provided by the transporter and accompany each hazardous material shipment. Disposal certification will be obtained from the RCRA Subtitle C facility.

7.4 IDW Log

A waste log will be developed and maintained to document the following information:

- Description of waste generated (e.g. soils, water)



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- Classification of wastes (non-hazardous, hazardous, etc.) including EPA code as applicable
- Quantities of waste generated
- Type of waste storage container
- Dates of waste generation
- Manifest/Bill of Lading Numbers

8.0 RECORDS

- Waste Log
- Waste Profiles
- Non-Hazardous Waste Manifest/Bill of Lading
- RCRA Uniform Hazardous Waste Manifest, if needed
- Hazardous Waste Disposal Certification, if needed
- DOT Hazardous Material Registration, if needed

